

# **EXHIBIT C**

Travis Hayes Folk , Ph.D.  
MST, LLC v. North American Land Trust, et al.

February 12, 2025

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1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF SOUTH CAROLINA  
3 CHARLESTON DIVISION  
4 MST, LLC,  
5 Plaintiff,  
6 vs. CASE NO. 2:22-cv-00874-DCN  
7 NORTH AMERICAN LAND TRUST AND GEORGETOWN  
8 MEMORIAL HOSPITAL,  
9 Defendants.  
10  
11 GEORGETOWN MEMORIAL HOSPITAL,  
12 Third-Party Plaintiff,  
13 vs.  
14 KYLE YOUNG AND JACQUELINE YOUNG,  
15 Third-Party Defendants.

13 VIDEOTAPED  
14 DEPOSITION OF: TRAVIS HAYES FOLK, PHD  
15  
16 DATE: February 12, 2025  
17  
18 TIME: 10:07 AM  
19  
20 LOCATION: NELSON MULLINS RILEY &  
21 SCARBOROUGH  
22 151 Meeting Street  
23 Suite 600  
24 Charleston, SC  
25  
26 TAKEN BY: Counsel for the Defendant and  
27 Third-Party Plaintiff,  
28 GEORGETOWN MEMORIAL HOSPITAL  
29  
30 REPORTED BY: MICHAEL DAVID ROBERTS,  
31 Court Reporter

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<p style="text-align: right;">Page 126</p> <p>1 hypothesis, you placed a flag approximately 25 to 2 30 feet high and -- 3 A. As high as I could reach. I couldn't 4 get that high. That's why I used the Marsh House 5 as a stand in, which was right on the edge and in 6 my mind presumably if I -- if I was going to see 7 something, I should be able to see that. 8 Q. How high did you place the -- the -- 9 the flag? 10 A. I think I stood on the back of my truck 11 and got it 15 -- 12, maybe 15 feet. But, again, 12 the Marsh House was also -- I also used that to 13 look at that. 14 Q. Now, in certain pictures in your report 15 you can see the Marsh House fairly clearly. 16 A. I wouldn't call it clearly. Minimally. 17 Q. Well, that's from a camera; is that 18 right? Is that on your phone? 19 A. Uh-huh. 20 Q. Did that apply any magnification? 21 A. Uh-huh. 22 Q. How much? 23 A. I don't remember. I zoomed in. 24 Q. And -- and if we're looking on page 31 25 of your report, that's an example of a photo where</p> <p style="text-align: right;">Page 127</p> <p>1 you can see the Marsh House; is that right? 2 A. Uh-huh. 3 Q. Now, if there had been some clearing, 4 thinning of the understory, if dwellings had been 5 built within those building envelopes, it's 6 possible those could be seen from this same 7 position where you took the image of the Marsh 8 House; is that right? 9 MR. WALKER: Object to the form of the 10 question. 11 THE WITNESS: I guess anything is 12 possible, if they were a bright color or lava 13 lights; but the distance there was -- they were 14 treating all of those building envelopes as equally 15 visible from the river, and they were not. They 16 were variable distances back off the marsh. 17 BY MR. MORAN: 18 Q. Is that your interpretation that they 19 were all being treated equally, or is that what it 20 says? 21 A. Particularly due -- and I'm reciting -- 22 Q. Please. 23 A. -- page 32, statement B, my citation of 24 the amendment. Particularly due to the superior 25 location of five dwelling units -- five dwellings</p>	<p style="text-align: right;">Page 128</p> <p>1 in terms of scenic view from the Pee Dee River, 2 Black River and Intracoastal. 3 In my mind that's that -- that equates 4 the footprint of all five of those having the same 5 scenic value to the rivers. They didn't say, with 6 diminished scenic value one through five. They 7 lumped them all into five dwellings in terms of 8 scenic values from the rivers. 9 Q. As compared to the hospital parcel with 10 Highway 701, right? 11 A. This statement just says the five -- 12 addresses the scenic -- what they viewed as the 13 value of the scenic view to the five dwellings from 14 the river, and that's what I considered in that 15 statement B. 16 Q. And they don't say there that they -- 17 they view them all as equally visible from -- from 18 the river and that they have equal distance or 19 anything like that; is that right? 20 A. If they weren't equal I would have 21 assumed that they would have been more precise in 22 their language versus just saying the five 23 dwellings in terms of scenic view. 24 Q. Again, that's based off your 25 assumption, correct? We don't know what NALT</p> <p style="text-align: right;">Page 129</p> <p>1 itself -- 2 A. Again, NALT's thought process leading 3 to the amendment, I have never been privy to that, 4 but that would be illuminating to say the least. 5 Q. I want to go back to something you 6 testified to previously, and please correct me if I 7 misstate this, okay. 8 But you testified that you -- it's your 9 opinion, one of your opinions, that the ecological 10 benefits of the amendment do not outweigh the 11 ecological detriments as a result from that 12 amendment; is that correct? 13 A. Yes. 14 Q. And then separately you provide a -- a 15 critique of Alton Brown in your report; is that 16 correct? 17 A. Correct. 18 Q. Okay. Which portions of your report 19 specifically relate to your critique of Mr. Brown 20 as opposed to your analysis of the ecological 21 values of the amendment? 22 A. Towards the end critique -- starting on 23 page 34, critique of expert opinions offered by 24 Alton Brown. 25 Q. Okay. Have you ever met Mr. Brown?</p>
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